



### MAR 25 2015

Mr. Ben Cuthbertson CertainTeed Corporation 17775 Avenue 23 1/2 Chowchilla, CA 93610

Re: Notice of Minor Title V Permit Modification District Facility # C-261 Project # C-1150848

Dear Mr. Cuthbertson:

Enclosed is the District's analysis of your application for minor Title V permit modification for the facility identified above. You proposed a Title V minor permit modification to incorporate recently issued ATC C-261-32-0 (under project C-1142842) into the Title V operating permit. The purpose of the project is to install a 183 bhp Tier 3-certified diesel-fired emergency IC engine powering a firewater pump.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued ATC C-261-32-0, emission increases, application, and previous Title V permit. This project will be subject to a 45-day EPA commenting period prior to the District taking final action.

If you have any questions, please contact Mr. Jim Swaney, Permit Services Manager, at (559) 230-5900.

Thank you for your cooperation in this matter.

Sincerely,

Arnaud Marjollet

Director of Permit Services

**Enclosures** 

cc: Gerardo C. Rios, EPA (w/enclosure) via email

Seyed Sadredin Executive Director/Air Pollution Control Officer

## TITLE V APPLICATION REVIEW

Minor Modification Project #: C-1150848

Engineer: Sandra Lowe-Leseth

Date: March 24, 2015

Facility Number: C-261

Facility Name: CertainTeed Corporation
Mailing Address: 17775 Avenue 23 1/2
Chowchilla. CA 93610

Contact Name: Ben Cuthbertson

Phone: 559-665-4831

Responsible Official: Matthey Prue

Title: Plant Manager

#### I. PROPOSAL

CertainTeed Corporation is proposing a Title V minor permit modification to incorporate recently issued Authority to Construct (ATC) C-261-32-0 (under project C-1142842) into the Title V operating permit. The applicant installed a 183 bhp Tier 3-certified diesel-fired emergency engine powering a firewater pump.

The purpose of this evaluation is to identify all applicable requirements, determine if the facility will comply with the applicable requirements and to provide the legal and factual basis for the proposed revisions.

## II. FACILITY LOCATION

The facility is located at 17775 Avenue 23 ½ in Chowchilla, CA.

### III. EQUIPMENT DESCRIPTION

C-261-32-1: 183 BHP (INTERMITTENT) CLARKE MODEL JU6H-UFAD58 TIER

3 CERTIFIED DIESEL-FIRED EMERGENCY IC ENGINE

POWERING A FIREWATER PUMP

## IV. SCOPE OF EPA AND PUBLIC REVIEW

This change to a Title V permit is considered to be a minor modification and, as such, requires no public review.

## V. APPLICABLE REQUIREMENTS

District Rule 2520, <u>Federally Mandated Operating Permits</u> (Adopted June 21, 2001)

### VI. DESCRIPTION OF PROPOSED MODIFICATIONS

CertainTeed Corporation installed a diesel-fired emergency engine to power a firemwater pump. Because this project establishes a new permit unit, there is no current Permit to Operate (PTO) for the unit. The following analysis will compare the ATC conditions to the proposed Permit to Operate (PTO) conditions.

Condition #1 of the ATC requires that the applicant apply to modify their current Title V permit to include the unit in the Title V permit in accordance with the timeframes and procedures of District Rule 2520. Operator has submitted an application to modify the facility's Title V operating permit. Application is included in Appendix D of this document.

All other conditions of the ATC will be included in the Title V permit without change.

#### VII. COMPLIANCE

In accordance with Rule 2520, 3.20, these modifications:

- 1. Do not violate requirements of any applicable federally enforceable local or federal requirement;
- 2. Do not relax monitoring, reporting, or recordkeeping requirements in the permit and are not significant changes in existing monitoring permit terms or conditions;
- Do not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination for temporary sources of ambient impacts, or a visibility or increment analysis;
- 4. Do not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject. Such terms and conditions include;

- A federally enforceable emission cap assumed to avoid classification as a modification under any provisions of Title I of the Federal Clean Air Act; and
- b. An alternative emissions limit approved pursuant to regulations promulgated under section 112(i)(5) of the Federal Clean Air Act; and
- Are not Title I modifications as defined in District Rule 2520 or modifications as defined in section 111 or 112 of the Federal Clean Air Act; and
- 6. Do not seek to consolidate overlapping applicable requirements.

In accordance with Rule 2520, the application meets the procedural requirements of section 11.4 by including;

- 1. A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;
- 2. The source's suggested draft permit; and
- 3. Certification by a responsible official that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used.

### VIII. ATTACHMENTS

- A. Proposed Modified Title V Operating Permit No. C-261-32-1
- B. Authority to Construct No. C-261-32-0
- C. Emissions Increases
- D. Application

## **ATTACHMENT A**

Proposed Modified Title V Operating Permit No. C-261-32-1

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-261-32-1

EXPIRATION DAILE 03/3/1/2016

#### **EQUIPMENT DESCRIPTION:**

183 BHP (INTERMITTENT) CLARKE MODEL JU6H-UFAD58 TIER 3 CERTIFIED DIESEL-FIRED EMERGENCY IC ENGINE POWERING A FIREWATER PUMP

## **PERMIT UNIT REQUIREMENTS**

- 1. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
- 2. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
- 3. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit
- 4. The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap (flapper ok), roof overhang, or any other obstruction. [District Rule 4102] Federally Enforceable Through Title V Permit
- Only CARB certified diesel fuel containing not more than 0.0015% sulfur by weight is to be used. [District Rules 2201 and 4801 and 17 CCR 93115 and 40 CFR 60 Subpart IIII] Federally Enforceable Through Title V Permit
- 6. This engine shall be equipped with an operational non-resettable elapsed time meter or other APCO approved alternative. [District Rule 4702] Federally Enforceable Through Title V Permit
- Emissions from this IC engine shall not exceed any of the following limits: 2.7 g-NOx/bhp-hr, 0.9 g-CO/bhp-hr, or 0.1 g-VOC/bhp-hr. [District Rule 2201 and 13 CCR 2423 and 17 CCR 93115 and 40 CFR 60 Subpart IIII] Federally Enforceable Through Title V Permit
- Emissions from this IC engine shall not exceed 0.1 g-PM10/bhp-hr based on USEPA certification using ISO 8178 test procedure. [District Rules 2201 and 4102 and 13 CCR 2423 and 17 CCR 93115] Federally Enforceable Through Title V Permit
- 9. This engine shall be operated and maintained in proper operating condition as recommended by the engine manufacturer or emissions control system supplier. [District Rule 4702 and 40 CFR 60 Subpart IIII] Federally Enforceable Through Title V Permit
- 10. An emergency situation is an unscheduled event caused by sudden and reasonably unforeseen natural disasters or sudden and reasonably unforeseen events beyond the control of the permittee. [District Rule 4702] Federally Enforceable Through Title V Permit
- 11. This engine shall be operated only for testing and maintenance of the engine, required regulatory purposes, and during emergency situations. For testing purposes, the engine shall only be operated the number of hours necessary to comply with the testing requirements of the National Fire Protection Association (NFPA) 25 "Standard for the Inspection, Testing, and Maintenance of Water-Based Fire Protection Systems". Total hours of operation for all maintenance, testing, and required regulatory purposes shall not exceed 100 hours per calendar year. [District Rule 4702 and 17 CCR 93115] Federally Enforceable Through Title V Permit

PERMIT UNIT RECUIREMENTS CONTINUE ON NEXT PAGE
These terms and conditions are part-of the Facility-wide Permit to Operate.

Facility Name: CERTAINTEED CORPORATION
Location: 17775 AVENUE 23 1/2, CHOWCHILLA, CA 93610
C-261-32-1: Mar 25 2015 648AM - LOWELES

- 12. The permittee shall maintain monthly records of emergency and non-emergency operation. Records shall include the number of hours of emergency operation, the date and number of hours of all testing and maintenance operations, and the purpose of the operation (for example: load testing, weekly testing, rolling blackout, general area power outage, etc.). For units with automated testing systems, the operator may, as an alternative to keeping records of actual operation for testing purposes, maintain a readily accessible written record of the automated testing schedule. [District Rule 4702 and 17 CCR 93115] Federally Enforceable Through Title V Permit
- 13. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rule 4702 and 17 CCR 93115] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

## **ATTACHMENT B**

Authority to Construct No. C-261-32-0





## **AUTHORITY TO CONSTRUCT**

PERMIT NO: C-261-32-0

**ISSUANCE DATE: 11/25/2014** 

LEGAL OWNER OR OPERATOR: CERTAINTEED CORPORATION

MAILING ADDRESS:

17775 AVENUE 23 1/2 CHOWCHILLA, CA 93610

LOCATION:

17775 AVENUE 23 1/2 CHOWCHILLA, CA 93610

#### **EQUIPMENT DESCRIPTION:**

183 BHP (INTERMITTENT) CLARKE MODEL JU6H-UFAD58 TIER 3 CERTIFIED DIESEL-FIRED EMERGENCY IC ENGINE POWERING A FIREWATER PUMP

## CONDITIONS

- The facility shall submit an application to modify the Title V permit in accordance with the timeframes and procedures of District Rule 2520. [District Rule 2520] Federally Enforceable Through Title V Permit
- 2. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
- 3. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
- No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
- The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap (flapper ok), roof overhang, or any other obstruction. [District Rule 4102]
- Only CARB certified diesel fuel containing not more than 0.0015% sulfur by weight is to be used. [District Rules 2201 and 4801 and 17 CCR 93115 and 40 CFR 60 Subpart IIII]
- This engine shall be equipped with an operational non-resettable elapsed time meter or other APCO approved alternative. [District Rule 4702]
- Emissions from this IC engine shall not exceed any of the following limits: 2.7 g-NOx/bhp-hr, 0.9 g-CO/bhp-hr, or 0.1 g-VOC/bhp-hr. [District Rule 2201 and 13 CCR 2423 and 17 CCR 93115 and 40 CFR 60 Subpart IIII]
- Emissions from this IC engine shall not exceed 0.1 g-PM10/bhp-hr based on USEPA certification using ISO 8178 test procedure. [District Rules 2201 and 4102 and 13 CCR 2423 and 17 CCR 93115]

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO

Arnaud Marjollet, Director of Permit Services



Conditions for C-261-32-0 (continued)

Page 2 of 2

- 10. This engine shall be operated and maintained in proper operating condition as recommended by the engine manufacturer or emissions control system supplier. [District Rule 4702 and 40 CFR 60 Subpart IIII]
- 11. An emergency situation is an unscheduled event caused by sudden and reasonably unforeseen natural disasters or sudden and reasonably unforeseen events beyond the control of the permittee. [District Rule 4702]
- 12. This engine shall be operated only for testing and maintenance of the engine, required regulatory purposes, and during emergency situations. For testing purposes, the engine shall only be operated the number of hours necessary to comply with the testing requirements of the National Fire Protection Association (NFPA) 25 "Standard for the Inspection, Testing, and Maintenance of Water-Based Fire Protection Systems". Total hours of operation for all maintenance, testing, and required regulatory purposes shall not exceed 100 hours per calendar year. [District Rule 4702 and 17 CCR 93115]
- 13. The permittee shall maintain monthly records of emergency and non-emergency operation. Records shall include the number of hours of emergency operation, the date and number of hours of all testing and maintenance operations, and the purpose of the operation (for example: load testing, weekly testing, rolling blackout, general area power outage, etc.). For units with automated testing systems, the operator may, as an alternative to keeping records of actual operation for testing purposes, maintain a readily accessible written record of the automated testing schedule. [District Rule 4702 and 17 CCR 93115]
- 14. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rule 4702 and 17 CCR 93115]

# ATTACHMENT C

**Emissions Increases** 

	SSIPE (lb/yr)				
	NOx	VOC	CO	SOx	PM10
C-261-32-1	109	4	36	0	4
TOTAL	109	4	36	0	4

## ATTACHMENT D

Application



March 11, 2015

RECEIVED

MAR I 6 2015

Permits Services
SJVAPCD

Stanley Tom Senior Air Quality Engineer San Joaquin Valley Air Pollution Control District 1990 E. Gettysburg Avenue Fresno, CA 93726

Re: Title V Minor Modification for New Emergency Fire Pump Engine

CertainTeed Corporation (Chowchilla, CA)

Facility C-261

Dear Mr. Tom:

CertainTeed Corporation owns and operates an existing fiberglass production facility located in Chowchilla, California. With this application, CertainTeed proposes a minor modification to its current Title V permit to include a new permit for an emergency fire pump engine.

Thank you in advance for your consideration. Please contact me at (510) 420-2540 regarding this matter, or contact Ben Cuthbertson at CertainTeed at (559) 201-3688.

Sincerely,

Steven Branoff

Principal

**Enclosures** 

## San Joaquin Valley Air Pollution Control District IVED

www.valleyair.org

MAR 1 6 2015

## Permit Application For:

[ ] ADMINISTRATIVE AMENDMENT

Permits Services [X] MINOR MODIFICATION [ ] SIGNIFICANT MODIFICATION

PERMIT TO BE ISSUED TO: CertainTe	ed Corporation				
2. MAILING ADDRESS:					
STREET/P.O. BOX: 17775 Avenue 23 ½					
		9-DIGIT			
CITY: Chowchilla	STATE: CA	ZIP CODE: 93610			
<ol> <li>LOCATION WHERE THE EQUIPMENT WII STREET: Same as above</li> </ol>		INSTALLATION DATE:			
	CITY:P RANGE	<del></del>			
	1000				
4. GENERAL NATURE OF BUSINESS: Fiberglass production					
DESCRIPTION OF EQUIPMENT OR MODIF (include Permit #'s if known, and use additional C-261-32: Addition of new fire pump en	ll sheets if necessary)	TION IS MADE			
6. TYPE OR PRINT NAME OF APPLICANT:		TITLE OF APPLICANT:			
Ben Cuthbertson		EHS Manager			
7. SIGNATURE OF APPLICANT:	DATE:	PHONE: (559)665-4831			
		FAX: (559)665-3321			
XV	3.11.15	EMAIL: Ben.D.Cuthbertson@saint-gobain.com			
For APCD Use Only:					
DATE STAMP	FILING FEE RECEIVED : \$	CHECK#:			
	DATE PAID:				
	PROJECT NO: C1150848 FACILITY ID: C261				

## San Joaquin Valley Unified Air Pollution Control District

### TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM

I. TYPE OF PERMIT ACTION (Check appropriate box)
[ ] SIGNIFICANT PERMIT MODIFICATION [ ] ADMINISTRATIVE [X] MINOR PERMIT MODIFICATION AMENDMENT
COMPANY NAME: CertainTeed Corporation FACILITY ID: C = 261
1. Type of Organization:[X] Corporation [ ] Sole Ownership [ ] Government [ ] Partnership [ ] Utility
2. Owner's Name: CertainTeed Corporation
3. Agent to the Owner:
II. COMPLIANCE CERTIFICATION (Read each statement carefully and initial all circles for confirmation):
Based on information and belief formed after reasonable inquiry, the equipment identified in this application we continue to comply with the applicable federal requirement(s).
Based on information and belief formed after reasonable inquiry, the equipment identified in this application we comply with applicable federal requirement(s) that will become effective during the permit term, on a timely based on information and belief formed after reasonable inquiry, the equipment identified in this application we
Corrected information will be provided to the District when I become aware that incorrect or incomplete information has been submitted.
Based on information and belief formed after reasonable inquiry, information and statements in the submitted application package, including all accompanying reports, and required certifications are true accurate and complete.
I declared under penalty of perjury under the laws of the state of California, that the forgoing is correct and true:
Meshec 3/11/15
Signature of Responsible Official Date
Matthew Prue
Name of Responsible Official (please print)
Plant Manager
Title of Responsible Official (please print)